

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  THE COMMONWEALTH OF PUERTO RICO et al., Debtors. <sup>1</sup>	PROMESA Title III  No. 17 BK 3283-LTS (Jointly Administered)
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**Motion submitting Part of Exhibit II of BDO Puerto Rico, PSC's (now known as, Old Puerto Rico, PSC) Response to 570th Omnibus Objection**

**TO THE HONORABLE COURT:**

COMES NOW BDO Puerto Rico PSC (now known as, **Old Puerto Rico, PSC**) represented by the undersigned attorney and respectfully sets forth and prays:

1. Exhibit no. II of the appearing party's Response to the 570<sup>th</sup> Omnibus objection contains 830 pages. Due to the data storage limits set by the CM/ECF system when filing an exhibit, Creditor BDO Puerto Rico PSC (hereinafter "**OLD**") must file Exhibit II in parts. ECF no. 24317.
2. Therefore, Creditor OLD will file several notices with Exhibit II divided into parts of approximately 70 to 95 pages each. With this motion, Creditor includes pages 640-721 and 722-830 of Exhibit II.

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**WHEREFORE**, Creditor hereby submits the attached partial Exhibit II for its Response to the 570<sup>th</sup> Omnibus Objection filed today at ECF no. 24317.

**RESPECTFULLY SUBMITTED.**

**CERTIFICATE OF SERVICE:** In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court's Sixteenth Amended Notice, Case Management and Administrative Procedures Order (Dkt. No. 20190-1) (the "CMP Order"), I hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

In Guaynabo, Puerto Rico, on May 25, 2023.

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